

1 Rachael D. Lamkin (SBN 246066)
2 Karan Singh Dhadialla (SBN 296313)
3 BAKER BOTTS L.L.P.
4 101 California Street, Suite 3200
5 San Francisco, California 94111
6 Phone: (415) 291-6200
7 Fax: (415) 291-6300
8 rachael.lamkin@bakerbotts.com
9 karan.dhadialla@bakerbotts.com

10 *Attorneys for Defendant*
11 *NETFLIX, INC.*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 LAURI VALJAKKA,
16 *Plaintiff,*
17 *v.*
18 NETFLIX, INC.,
19 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF RACHAEL D.
LAMKIN IN SUPPORT OF DEFENDANT
NETFLIX, INC.'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL [SUPPLEMENTAL BRIEF
REGARDING EXPENSES AND FEES
PURSUANT TO ECF NO. 324]**

Judge: Hon. Jon S. Tigar

1 I, Rachael D. Lamkin, hereby declare:

2 1. I am a partner with the law firm Baker Botts L.L.P. (“Baker Botts”), and counsel of
3 record for Defendant Netflix, Inc. (“Netflix”) in the above-captioned matter.

4 2. I am admitted to practice in all state and federal courts in California, federal courts
5 in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal
6 Circuit, the International Trade Commission, the Court of International Trade, and this Honorable
7 Court.

8 3. I have personal knowledge of the facts stated herein.

9 4. Pursuant to Civil L.R. 79-5(e), I make this declaration in support of Netflix’s
10 Administrative Motion to File Documents Under Seal Pursuant to Civil L.R. 79-5 (“Administrative
11 Motion”) to establish that certain documents contain material that discusses confidential business
12 information of Netflix and Baker Botts.

13 5. Specifically, the sealable portions of the Declaration of Rachael D. Lamkin in
14 Support of Netflix’s Supplemental Brief regarding Expenses and Fees Pursuant to ECF No. 324,
15 and exhibits thereto, include the billing rates of Netflix’s outside counsel at Baker Botts for work
16 performed in this matter. These confidential billing rates are the product of negotiations between
17 Netflix and Baker Botts and reflect discounts provided to Netflix below Baker Botts’ standard
18 billing rates.

19 6. Attached hereto is a true and correct copy of the unredacted Declaration of Rachael
20 D. Lamkin in Support of Netflix’s Supplemental Brief regarding Expenses and Fees Pursuant to
21 ECF No. 324, and all exhibits thereto. Netflix seeks permission for only the redacted portions of
22 that Declaration and supporting exhibits to remain under seal because they reflect information
23 related to the confidential outside counsel billing rates.

24 7. All versions of Baker Botts’ billing records related to work performed on this matter
25 that are being submitted in support of Netflix’s Supplemental Brief include redactions to attorney
26 time unrelated to Netflix’s Supplemental Brief and its present request for attorneys’ fees and costs.
27 Many of these entries reflect attorney-client privileged information and/or the substance of work
28

1 product related to Netflix's ongoing CUVTA claims against Plaintiff Lauri Valjakka, or its eventual
2 claim for attorneys' fees as a prevailing party in the patent infringement litigation filed by Mr.
3 Valjakka (including against former counsel, Mr. Ramey).

4 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
5 and correct to the best of my knowledge.

6 Executed on September 2, 2025 in San Francisco, California.

7
8 /s/ Rachael D. Lamkin
9 Rachael D. Lamkin
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28